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August 1, 2025

VIA ECF

The Honorable Sarah L. Cave
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 18A
New York, New York 10007

Re: *Piney, et al. v. City of New York, et al.*, No. 1:25-cv-00671-DEH-SLC

Dear Judge Cave:

We represent Plaintiffs and write to request a two-month extension of the deadline for Plaintiffs to seek leave to file a third amended complaint from August 15, 2025 to October 15, 2025.

Plaintiffs are actively conferring with defendants and exchanging records concerning their participation in the paid detail program. Plaintiffs are still waiting to obtain additional information and records from certain defendants to resolve outstanding issues. Additionally, Plaintiffs are engaging in rigorous settlement discussions with over two-dozen defendants, many of which will conclude in the next two months. The resolution of these discussions will likely impact the substance of Plaintiffs' third amended complaint and any motion for leave relating to same.

As such, Plaintiffs respectfully request that their deadline to seek leave to file a third amended complaint be extended to October 15, 2025. This is the second request for an extension of this deadline; Plaintiffs' first request was previously granted. The requested extension does not impact any other deadlines in this case.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'I. Huot'.

Innessa M. Huot

cc: Counsel of Record (*via* ECF)